

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Amendment of Section 73.202(b))	
Table of Allotments)	MB Docket No. 05-35
FM Broadcast Stations)	RM - 11134
(Charlotte and Jackson, Michigan))	
)	

RECEIVED

To: Office of the Secretary
Attn: Assistant Chief, Audio Division
Media Bureau

MAR 28 2005

Federal Communications Commission
Office of Secretary


COMMENTS

Rubber City Radio Group ("Rubber City"), licensee of Station WJXQ(FM), Jackson, Michigan, by its counsel and pursuant to Sections 1.415 and 1.419 of the Commission's Rules, hereby submits its Comments in the above captioned proceeding. *See Notice of Proposed Rule Making*, DA 05-289, (released February 4, 2005). Rubber City's Petition for Rule Making proposed to delete Channel 291B at Jackson, Michigan, allot Channel 291B at Charlotte, Michigan, and modify the license of Station WJXQ(FM) accordingly at its current site. As detailed in the *NPRM*, grant of Rubber City's proposal will eliminate a potential conflict between (i) a proposal to change the community of license of WQTX(FM) from Charlotte, Michigan to Grand Ledge, Michigan in MB Docket No. 03-222, and (ii) a pending major change application to change the community of license of WLCM(AM) from Charlotte, Michigan to Holt, Michigan. *See* BMJP-20050114ADQ. These two proposals taken together would leave Charlotte without local service. Instead of having to choose between the two proposals, this Petition would provide a local service to Charlotte and enable both of the other pending proposals to be granted. Rubber City hereby affirms its interest in modifying the facilities of

Station WJXQ(FM) as stated in its Petition. If the Petition is granted, Rubber City will file an application for Channel 291B at Charlotte, and will construct the facilities if its application is granted.

Respectfully submitted,

RUBBER CITY RADIO GROUP

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March 28, 2005


Its Counsel

CERTIFICATE OF SERVICE

I, Tonya Dawson, of Vinson & Elkins, L.L.P., do hereby certify that I have on this 28th day of March, 2005, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "**Comments**" to the following:

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